

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

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March 15, 1993

Mr. Joseph P. Kwan
TRW, Inc.
One Space Park, 140/1536
Redondo Beach, California 90278

**CLEANUP PLAN AND OFF-SITE GROUNDWATER INVESTIGATION - MONADNOCK
FACILITY, CITY OF INDUSTRY (FILE NO. 105.0181)**

In the meeting between staff and representatives of TRW, Inc., held on November 6, 1992, a request was made to provide at least a limited approval for portions of the subject cleanup plan. In particular TRW wishes to install the various extraction wells and commence the off-site groundwater investigation. The full plan will be evaluated and commented upon in subsequent communication, but the following pertain to vapor extraction wells and the additional groundwater investigation:

CLEANUP

1. Based upon the existing data the locations proposed for vapor extraction wells are acceptable. If either pressure or VOC concentration monitoring demonstrates that contaminated areas are not being fully treated, additional extraction locations will be required.
2. Staff has no objection to the proposed pressure monitoring wells. However, it reserves the option of requiring additional pressure monitoring as a result of subsequent review. All assumptions need to be supportable. Similarly it will, as stated to TRW in the meeting, require a reasonably complete array of multi-level soil gas sampling points covering the contaminated soils to be remediated by vapor extraction. The pressure monitoring wells need to be targeted for different depths (nested) - not simply single wells with multiple slotted sections.
3. As stated to TRW in the latest meeting, cleaning criteria are not acceptable as proposed. Revision will be necessary in the full cleanup plan revision.

OFF-SITE

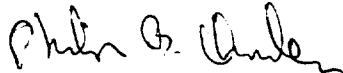
1. Staff agrees that slug tests are appropriate as a means of estimating flow rates for the purposes discussed. It is suggested that all wells at the site be "slug-tested" to develop a basis for uniformity conclusions. This may prove valid if TRW must treat the most highly contaminated waste at the site. Ultimately, pump tests will be required and the slug tests may determine where such measurements will be appropriate - and how from that data may be extended.
2. The use of hydropunch sampling to "scope" the lateral and areal extent of site-derived pollution in the upper most saturated horizons is acceptable.
3. Installation of three downgradient off-site monitoring wells may be insufficient. However, staff will accept that a minimum of three wells be installed in this phase. Once the hydropunch and monitoring well data from this phase are obtained, evaluation will determine what further work is necessary.
4. The general construction description is acceptable for the proposed three wells. Staff is willing to continue with twenty-foot screen in saturated horizons for these three wells. However, TRW will in the future be required to cluster wells with shorter screens. Sieve analyses need to be provided to staff to justify filter pack size decisions. Development procedures need to be described and documented. Be aware that simply agreeing to purge wells "...in conformance with RWQCB guidelines" is not generally sufficient to warrant acceptance of the analytical results. Report the well co-ordinates in the UTM co-ordinate system. Turbidity must be reported by the laboratory for all samples analyzed.
5. Analyses must include general minerals, metals and cyanide. Staff is concerned that previous waste discharge may not be currently reflected in on-site groundwater monitoring.
6. Water generated during well construction and development may be disposable through the industrial waste system.

In conclusion, staff agrees to allow TRW to install the extraction and pressure monitoring wells as proposed (subject to the foregoing comments) while the overall cleanup plan is being reviewed. This does not constitute approval of the entire plan. Staff further has no objections to going forward with the off-site groundwater monitoring program, again subject to the comments contained herein.

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Monthly progress reports (letter) will be required and a minimum of ten (10) days advance notice must be provided to staff prior to initiating field work.

If you have any questions, please contact me at (213) 266-7537.



PHILIP B. CHANDLER
Senior Engineering Geologist

PBC:la

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